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VIA ECF

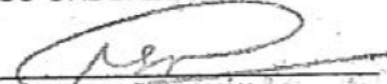
The Honorable Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Felicia Bramble v. Moody's Corporation, et al.*
Case No. 19-CV-5182 (NSR)

Defendants' request is GRANTED. Defendants' moving papers shall be served on March 4, 2022; Plaintiff's opposition shall be served on April 11, 2022; and Defendant's reply shall be due on May 6, 2022. The parties are to file their motion papers on May 6, 2022. The Clerk of Court is kindly directed to terminate the motion at ECF No. 29.

DATED: January 24, 2022
White Plains, NY

SO ORDERED:


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

As you are aware, we represent Defendants Moody's Corporation ("Moody's") and Adam Berkowicz ("Berkowicz") (collectively, "Defendants") in the above-referenced matter.¹ Pursuant to Section 1(E) of Your Honor's Individual Practice Rules ("IPRs") and Your Honor's December 20, 2021 Order (Dkt. No. 28) providing a briefing schedule for Defendants' Motion for Summary Judgment (the "Motion"), we respectfully request that Defendants' time to serve their moving papers be extended from February 4, 2022 to March 4, 2022; Plaintiff's time to oppose the Motion be extended from March 7, 2022 to April 11, 2022, and Defendants' time to reply to the Motion and file the Motion be extended from April 1, 2022 to May 6, 2022. The parties are requesting this extension as the settlement discussion in which they have been engaged in have failed, and in order to accommodate Plaintiff's counsel's trial schedule in another matter.

This is Defendants' second request for an extension of time to file their moving papers for the Motion (your Honor granted our prior request, *see* Dkt. No. 28), and the parties' first joint request. Plaintiff's counsel has consented to this request.

Respectfully,

/s/ Amanda L. Van Hoose Garofalo

Amanda L. Van Hoose Garofalo

AVHG/frm

¹ We also represent Defendant Scott Kenney, Senior Vice President, Risk-Management, and Chief Audit Executive ("Kenney"); however, pursuant to a statement on the record during Kenney's deposition, the plaintiff agrees to voluntarily dismiss Kenney from her lawsuit, with prejudice.

MEMO ENDORSED